

**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2009: 07/01/2009 - 06/30/2010)

October 6, 2010

David Long  
PALESTINE INDEP SCHOOL DIST  
1600 S LOOP 256  
PALESTINE, TX 75801-5847

Re: Form 471 Application Number: 689728  
Billed Entity Number (BEN): 140751  
Billed Entity FCC RN: 0013936489  
Applicant's Form Identifier: YR12VoIP-MYr

Thank you for your Funding Year 2009 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$109,642.18 is "Denied."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

**NEXT STEPS**

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity applicant) - as products and services are being delivered and billed

**TO APPEAL THIS DECISION:**

You have the option of filing an appeal with the SLD or directly with the Federal Communications Commission (FCC).

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
  - Appellant name,
  - Applicant name and service provider name, if different from appellant,
  - Applicant BEN and Service Provider Identification Number (SPIN),
  - Form 471 Application Number 689728 as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2009," AND
  - The exact text or the decision that you are appealing.



3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email your appeal to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org). USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
100 S. Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981

If you wish to appeal a decision in this letter to the FCC, you should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

#### OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to our website for more information.

#### NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division  
Universal Service Administrative Company



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FUNDING COMMITMENT REPORT  
Billed Entity Name: PALESTINE INDEP SCHOOL DIST  
BEN: 140751  
Funding Year: 2009

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 689728  
Funding Request Number: 1889257  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 619260000700220  
SPIN: 143025872  
Service Provider Name: Trillion Partners, Inc  
Contract Number: N/A  
Billing Account Number: 903-731-8000  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2009  
Service End Date: N/A  
Contract Award Date: 02/12/2009  
Contract Expiration Date: 06/30/2014  
Shared Worksheet Number: 1125436  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$135,360.72  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$135,360.72  
Discount Percentage Approved by the USAC: 81%  
Funding Commitment Decision: \$0.00 - Bidding Violation- SRC  
Funding Commitment Decision Explanation: The FRN will be denied because you did not conduct a fair and open competitive bidding process. The documentation provided by you and/or the service provider indicates that the school district engaged in numerous meetings, e-mail discussions, and/or verbal discussions with Trillion employees prior to the posting of the Form 470 and throughout the competitive bidding process which tainted the competitive bidding process. Trillion was consulted and/or offered details about services and products you were requesting on your FCC Form 470 and/or Request for Proposal (RFP). The competitive bidding process was influenced by Trillion when they assisted you in developing your services specifications for your FCC Form 470/or RFP. You failed to conduct a fair and open competitive bidding process free from conflicts of interest.  
FCDL Date: 10/06/2010  
Wave Number: 069  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2011







**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2010: 07/01/2010 - 06/30/2011)

October 6, 2010

David Long  
PALESTINE INDEP SCHOOL DIST  
1600 S LOOP 256  
PALESTINE, TX 75801-5847

Re: Form 471 Application Number: 759855  
Billed Entity Number (BEN): 140751  
Billed Entity FCC RN: 0013936489  
Applicant's Form Identifier: YR13 VoIP

Thank you for your Funding Year 2010 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$131,443.47 is "Denied."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

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1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
  - Appellant name,
  - Applicant name and service provider name, if different from appellant,
  - Applicant BEN and Service Provider Identification Number (SPIN),
  - Form 471 Application Number 759855 as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2010," AND
  - The exact text or the decision that you are appealing.



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Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

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Schools and Libraries Division  
Universal Service Administrative Company



FUNDING COMMITMENT REPORT  
Billed Entity Name: PALESTINE INDEP SCHOOL DIST  
BEN: 140751  
Funding Year: 2010

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 759855  
Funding Request Number: 2052798  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 619260000700220  
SPIN: 143025872  
Service Provider Name: Trillion Partners, Inc  
Contract Number: n/a  
Billing Account Number: 903-731-8000  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2010  
Service End Date: N/A  
Contract Award Date: 02/12/2009  
Contract Expiration Date: 06/30/2014  
Shared Worksheet Number: 1249601  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$135,360.72  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$135,360.72  
Discount Percentage Approved by the USAC: 87%  
Funding Commitment Decision: \$0.00 - Bidding Violation- SRC  
Funding Commitment Decision Explanation: The FRN will be denied because you did not conduct a fair and open competitive bidding process. The documentation provided by you and/or the service provider indicates that the school district engaged in numerous meetings, e-mail discussions, and/or verbal discussions with Trillion employees prior to the posting of the Form 470 and throughout the competitive bidding process which tainted the competitive bidding process. Trillion was consulted and/or offered details about services and products you were requesting on your FCC Form 470 and/or Request for Proposal (RFP). The competitive bidding process was influenced by Trillion when they assisted you in developing your services specifications for your FCC Form 470/or RFP. You failed to conduct a fair and open competitive bidding process free from conflicts of interest.  
FCDL Date: 10/06/2010  
Wave Number: 020  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2011

FUNDING COMMITMENT REPORT  
Billed Entity Name: PALESTINE INDEP SCHOOL DIST  
BEN: 140751  
Funding Year: 2010

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 759855  
Funding Request Number: 2052801  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 619260000700220  
SPIN: 143025872  
Service Provider Name: Trillion Partners, Inc  
Contract Number: n/a  
Billing Account Number: 903-731-8000  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2010  
Service End Date: N/A  
Contract Award Date: 02/19/2010  
Contract Expiration Date: 06/30/2015  
Site Identifier: 16059799  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$10,938.24  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$10,938.24  
Discount Percentage Approved by the USAC: 87%  
Funding Commitment Decision: \$0.00 - Bidding Violation- SRC  
Funding Commitment Decision Explanation: The FRN will be denied because you did not conduct a fair and open competitive bidding process. The documentation provided by you and/or the service provider indicates that the school district engaged in numerous meetings, e-mail discussions, and/or verbal discussions with Trillion employees prior to the posting of the Form 470 and throughout the competitive bidding process which tainted the competitive bidding process. Trillion was consulted and/or offered details about services and products you were requesting on your FCC Form 470 and/or Request for Proposal (RFP). The competitive bidding process was influenced by Trillion when they assisted you in developing your services specifications for your FCC Form 470/or RFP. You failed to conduct a fair and open competitive bidding process free from conflicts of interest.  
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FUNDING COMMITMENT REPORT  
Billed Entity Name: PALESTINE INDEP SCHOOL DIST  
BEN: 140751  
Funding Year: 2010

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 759855  
Funding Request Number: 2052803  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 619260000700220  
SPIN: 143025872  
Service Provider Name: Trillion Partners, Inc  
Contract Number: n/a  
Billing Account Number: 903-731-8000  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2010  
Service End Date: N/A  
Contract Award Date: 02/19/2010  
Contract Expiration Date: 06/30/2015  
Site Identifier: 16059257  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$4,785.48  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$4,785.48  
Discount Percentage Approved by the USAC: 87%  
Funding Commitment Decision: \$0.00 - Bidding Violation- SRC  
Funding Commitment Decision Explanation: The FRN will be denied because you did not conduct a fair and open competitive bidding process. The documentation provided by you and/or the service provider indicates that the school district engaged in numerous meetings, e-mail discussions, and/or verbal discussions with Trillion employees prior to the posting of the Form 470 and throughout the competitive bidding process which tainted the competitive bidding process. Trillion was consulted and/or offered details about services and products you were requesting on your FCC Form 470 and/or Request for Proposal (RFP). The competitive bidding process was influenced by Trillion when they assisted you in developing your services specifications for your FCC Form 470/or RFP. You failed to conduct a fair and open competitive bidding process free from conflicts of interest.

FCDL Date: 10/06/2010

Wave Number: 020

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